

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

GENERAL ELECTRIC COMPANY,)
Plaintiff,)
v.) Civil Action No. 08-591-TSE/JFA
ADRIANA KOECK,)
Defendant.)

JOINT STATUS REPORT

Plaintiff General Electric Company and defendant Adriana Koeck make the following joint status report:

1. By order of December 15, 2008, the Court once more stayed this action in order to allow a settlement agreement to be finalized in a putative class action pending in the United States District Court for the District of Connecticut captioned *Lorena F. Schaefer v. General Electric Company, et al.*, Case No. 3:07-CV-0858 (PCD) ("Schaefer"). As the parties herein have represented to the Court, the parties in this case have reached an agreement on all outstanding claims in this action. This settlement, however, is part of a settlement in the *Schaefer* case.
2. By its December 15 order, the Court directed that the parties file a stipulation of dismissal by December 29.
3. The parties previously estimated that the final settlement documents would be executed by that date. This goal proved impossible to achieve, owing to the complexity of the *Schaefer* settlement and the intervening holidays. On December 29, the parties filed another

joint status report, indicating that the settlement was not yet finalized and requesting an extension until January 12, 2009. The Court granted the request by order of December 29.

4. The status of the settlement at this time is as follows: all material terms have been agreed to and all signatures have been affixed or are in the process of being affixed. Under the terms of the settlement agreement, the last period for revocation by the plaintiffs is seven days after the last signature is affixed. The settlement will become final on that day.

WHEREFORE, the parties ask that the Court keep the stay in place for an additional 11 days, to and including January 23, 2009.

Respectfully submitted,

/s/

Robert B. Nealon
Virginia Bar No. 23096
Jay I. Igiel
Virginia Bar No. 65576
Michael T. Pritchard
Virginia Bar No. 65846
Attorneys for Adriana Koeck
NEALON & ASSOCIATES, P.C.
119 N. Henry Street
Alexandria, VA 22314
(703) 684-5755
(703) 684-0153 (fax)
rbnealon@nealon.com
jigiel@nealon.com
mpritchard@nealon.com

/s/

Grant E. Morris
Virginia Bar No. 16260
LAW OFFICES OF GRANT MORRIS
1666 Connecticut Avenue, N.W.
Suite 310
Washington, D.C. 20009
(202) 742-7783
(202) 742-7776 (fax)
grantemorris@gmail.com

/s/

Charles B. Wayne
Virginia Bar No. 24954
Elisha A. King
Attorneys for General Electric Company
DLA PIPER LLP (US)
500 8th Street, N.W.
Washington, D.C. 20004
(202) 799-4000
(202) 799-5000 (fax)
charles.wayne@dlapiper.com

Of Counsel:

MORGAN, LEWIS & BOCKIUS LLP

Barbara Van Gelder
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 739-5256
(202) 739-3001 (fax)

Sarah E. Bouchard
Anne E. Martinez
1701 Market Street
Philadelphia, PA 19103
(215) 963-5077/5718
(215) 963-5001 (fax)

David W. Sanford
Stefanie F. Roemer
SANFORD, WITTELS & HEISLER, LLP
1666 Connecticut Avenue, N.W.,
Suite 310
Washington, D.C. 20009
(202) 742-7777
(202) 742-7776 (fax)
dsanford@nydclaw.com
sroemer@nydclaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of January, 2009, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send notification of such filing (NEF) to the following:

Grant E. Morris
Law Offices of Grant Morris
1666 Connecticut Avenue, N.W.
Suite 310
Washington, D.C. 20009

Robert B. Nealon
Michael T. Pritchard
Jay I. Igiel
Nealon & Associates, PC
119 N. Henry Street
Alexandria, VA 22314

David W. Sanford
Stefanie F. Roemer
Sanford, Wittels & Heisler, LLP
1666 Connecticut Avenue, N.W.
Suite 310
Washington, D.C. 20009

/s/
Charles B. Wayne
Virginia Bar No. 24954
Elisha A. King
Attorneys for General Electric Company
DLA PIPER LLP (US)
500 8th Street, N.W.
Washington, D.C. 20004
(202) 799-4000
(202) 799-5000 (fax)
charles.wayne@dlapiper.com